

November 17, 2020

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- STUART VARDAMAN -

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

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ULKU ROWE,

Plaintiff,

Case No.  
19 Civ. 08655 (LGS) (GWG)

v.

GOOGLE LLC

Defendant.

----- X

DATE: November 17, 2020

TIME: 9:37 a.m.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION  
OF STUART VARDAMAN, held via Zoom, pursuant to ^  
Notice, before Hope Menaker, a Shorthand Reporter  
and Notary Public of the State of New York.

November 17, 2020

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2 MS. GREENE: It -- it should be in  
3 there. It's right under -- in mine at least  
4 under Exhibit 114.

5 MR. GAGE: Yeah, I see it.

6 (Whereupon, Exhibit 115 was marked at  
7 this time.)

8 Q. Do you recognize this document?

9 A. Yes.

10 Q. And what do you recognize this  
11 document to be?

12 A. I recognize it to be the draft  
13 version of the role in Kirsten's organization, the  
14 VP role --

15 Q. And --

16 A. -- the VP role.

17 Q. And is this the -- is this what you  
18 provided to Ms. Rowe?

19 A. I guess so.

20 Q. In the prior exhibit, 114, you wrote,  
21 "It sounds like she and Rob are open to 'thinking  
22 differently' about this role, so it is not  
23 necessarily a prerequisite that someone has  
24 carried a sales revenue number." What did you  
25 mean about Kirsten and Rob thinking differently

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2 A. That was the thrust of the  
3 conversation and tying back to the appropriate  
4 next steps on the search, an appropriate next step  
5 in this case was winding down the process for Ulku  
6 and keeping her in mind for future executive  
7 positions within the financial services  
8 organization.

9 Q. What was the basis for your  
10 determination that she was not qualified for a  
11 position that was at the VP level?

12 A. It --

13 MR. GAGE: Objection.

14 A. It was largely emphasized by who  
15 ultimately the -- the candidates that we had in  
16 play and ultimately who landed in the role which  
17 is Yolanda Piazza, which as a -- as a data point  
18 was listed as one of American Bankers' most  
19 powerful women in -- in 2019, I believe.

20 Q. At this moment when you communicated  
21 this to Ms. Rowe, what was your basis for  
22 determining that she was not qualified to be  
23 considered for a VP level role?

24 MR. GAGE: Objection.

25 A. That would have been largely driven

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2 by her comparison to the external candidates.

3 Q. As of February, 2020 who were the  
4 external candidates that were being considered?

5 A. I don't know. I'd have to look that  
6 up. Yolanda Piazza was likely involved by then.

7 Q. Had interviews taken place at that  
8 point in time, panel interviews?

9 A. I don't recall.

10 Q. Did you consider the feedback with  
11 respect to Ms. Rowe in terms of determining that  
12 she was not qualified to be considered for this VP  
13 role?

14 MR. GAGE: Objection.

15 A. No, I didn't. Again, with the --  
16 with the financial services vertical lead role  
17 that ultimately was canceled, right, Tariq asked  
18 us to include her in process.

19 Q. Did you consider your close-out notes  
20 in Thrive with respect to Ms. Rowe in determining  
21 that she was not qualified to be considered for  
22 the VP sales role?

23 MR. GAGE: Objection.

24 A. No. As I stated, I don't recall  
25 entering that -- that close-out note and I think

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2 network was?

3 A. I don't recall.

4 Q. Do you know whether Ms. Rowe was  
5 considered or had an external reputation as an  
6 expert in this area?

7 MR. GAGE: Objection.

8 A. No, I don't recall.

9 Q. Do you know whether Ms. Rowe had a  
10 reputation as an industry titan, as you referred  
11 to it?

12 A. Compared to someone like Yolanda Pi  
13 -- Yolanda Piazza, I would say there's wide space.

14 Q. Did you know what Ms. Rowe's  
15 reputation was externally with respect to her job?

16 MR. GAGE: Objection.

17 A. No.

18 Q. Did you do anything to ascertain what  
19 her external reputation was professionally?

20 A. No, not that I recall.

21 MR. GAGE: Objection.

22 Q. Did you have any basis to compare Ms.  
23 Rowe to Ms. Piazza?

24 A. Aside from the publication as an  
25 example, I don't recall.